

## **REMARKS/ARGUMENTS**

The rejections presented in the Office Action dated December 12, 2006 (hereinafter Office Action) have been considered. Claims 1, 2, 4-19, 23-59, and 61 remain pending in the application. Reconsideration of the pending claims and allowance of the application in view of the present response is respectfully requested.

Claims 1, 2, 4-24 and 41-61 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,047,051 to Ginzboorg et al. (hereinafter “*Ginzboorg*”). Applicants respectfully traverse the rejection. The Applicants respectfully submit that the claims as originally filed are not rendered obvious by *Ginzboorg*. However, in order to facilitate prosecution of the application and in a *bona fide* attempt to advance the application to allowance, the Applicants present this response with amendment to clarify particular aspects of the claimed invention.

Regarding the rejection of Claims 1, 2, 4-24, and 49-61, independent Claims 1, 49, and 61 have been amended to at least set forth that each of a plurality of the bridge modules is configured with a subset of rules assigned to the services managed by that bridge module. One of the bridge modules is designated as a primary bridge module to distribute the rules to the plurality of bridge modules. Applicants submit that *Ginzboorg* fails to teach or suggest configuring each of a plurality of bridge modules with a subset of rules assigned to the services managed by that bridge module. *Ginzboorg* also fails to teach or suggest designating one of the bridge modules as a primary bridge module to distribute the rules to the plurality of bridge modules.

As stated in paragraph 3 of the Office Action, *Ginzboorg* discloses “an independent billing server between an Internet service provider, e.g. Fig. 9b, S3, and nine different types of charging elements, e.g., charging messages, network elements, e.g.” Without acquiescing to this characterization, Applicant submits nonetheless that nowhere does *Ginzboorg* teach or suggest that the billing server or any other network entity includes a plurality of bridge modules with a subset of rules assigned to the services managed by that bridge module.

*Ginzboorg* states that the “billing server can consist of several parallel server units and known load distribution principles can be used in connection with them, for example, by equipping them with a common load sharing unit, which distributes the service requests between the parallel units in a certain way.” (*Ginzboorg*, col. 13, lines 25-29). However, this is a description of standard load sharing between identical servers, where servers are chosen based on capacity, bandwidth, or location. For example, *Ginzboorg* describes a situation where servers are geographically limited, but both provide the same type of billing service (*Ginzboorg*, col. 13, line 30 to col. 14, line 8).

Nowhere does *Ginzboorg* teach or suggest a plurality of bridge modules that form a logical network layer between network elements and charging element, where each bridge module is configured with a subset of rules assigned to the services managed by that bridge module. *Ginzboorg* only teaches individual servers that handle all billing transactions, and is silent as to how individual rules are applied to the charging transactions. For example, in the description of each of the “nine different types (0-8) of charging records” in *Ginzboorg*, terms such as “sent from **the** billing server to the customer terminal” are used to describe transactions associated with these records (see, e.g., *Ginzboorg* col. 8, lines 11-12, 19-20, and 59-58)(emphasis added), and nowhere is it taught or suggested in *Ginzboorg* that rules associated with these transactions are distributed between individual bridge modules, each module managing a service to which the rules are assigned.

Because *Ginzboorg* is silent on disclosing a plurality of bridge modules with a subset of rules assigned to the services managed by that bridge module, then it also follows *Ginzboorg* fails to teach or suggest designating one of the bridge modules as a primary bridge module to distribute the rules to the plurality of bridge modules. As described above, *Ginzboorg* describes a load sharing scheme for distributing service requests, but is silent as to any component that distributes rules to bridge modules that are each configured with a subset of the rules assigned to the services managed by that bridge module. For at least these reasons, Applicant respectfully submits that a *prima facie* case of obviousness has not been established, because *Ginzboorg* fails to teach or suggest every limitation of at least independent Claims 1, 49, and 61.

Regarding the rejection of Claims 41-48, Applicant respectfully submits that these claims as originally filed are not rendered obvious by *Ginzboorg*. However, in order to facilitate prosecution of the application and in a *bona fide* attempt to advance the application to allowance, the Applicants present this response with amendment to clarify particular aspects of the claimed invention. These amendments make more clear what is believed to have been originally set forth in these claims, but now states so more specifically. In particular, Claim 41 has been amended to set forth that a plurality of charging information records generated by a plurality of network elements are received at a network charging edge. The plurality of charging information records are associated with a collective charging event related to a user session involving each of the plurality of network elements. The charging information records are coordinated into a user-session charging transaction at the one or more bridge modules of the network charging edge. Applicant respectfully submit that *Ginzboorg* does not teach or suggest associating either charging information records or a plurality of network elements with a collective charging event related to a user session involving each of the network elements.

*Ginzboorg* describes services provided to a customer terminal, CT. (*Ginzboorg*, col 4, lines 1-9). Although FIG. 2 of *Ginzboorg* shows multiple CTs, interactions with these terminals are consistently described in singular form, e.g., “the system includes at least one billing server WD, which collects and verifies charging records generated by the customer terminal.” (*Ginzboorg*, col 4, lines 7-9). Nowhere does *Ginzboorg* disclose or suggest that a single collective charging event or a single user session may be associated with more than one terminal device. Thus, *Ginzboorg* does not teach or suggest associating a plurality of network elements with a collective charging event related to a user session involving each of the network elements. Similarly, each of the “nine different types (0-8) of charging records” in *Ginzboorg*, the “customer terminal” is always described in the singular form. Thus *Ginzboorg* does not teach or suggest associating a collective charging event with a plurality of charging information records generated by a plurality of network elements. For at least these reasons, Applicant respectfully submits that a *prima facie* case of obviousness has not been established, because *Ginzboorg* fails to teach or suggest every limitation of at least independent Claim 41.

Further, regarding the rejections of dependent Claims 2, 4-19, and 41-59, the Applicant respectfully submits that the rejection of at least these claims is improper. As set forth in M.P.E.P. §707.07(d), the grounds of rejection are to be fully and clearly stated. It is respectfully submitted that the Examiner's listing does not fully and clearly indicate which claim recitations, or which of the rejected claims, the various listed items of *Ginzboorg* pertain to, particularly in reference to the dependent Claims 2, 4-19, 42-48, and 50-59, and to independent Claim 41.

It is also noted that a plurality of claims should never be grouped together in a common rejection, unless that rejection is equally applicable to all claims in the group. M.P.E.P. § 707.07(d). The Examiner has rejected Claims 2, 4-19, and 41-59 for the reasons presented in paragraph 3 of the Office Action, without providing evidence that *Ginzboorg* teaches or suggests particular elements of these claims, nor is any evidence provided regarding motivation to modify *Ginzboorg*. Each of these claims recites different aspects of the invention, and thus a common rejection of these claims is improper. If the Examiner maintains the rejection, the Applicants request clarification on which parts of the rejection are being applied to each of these claims.

Further, Applicants note that dependent Claims 2 and 4-19 depend from independent Claim 1; dependent Claims 42-48 depend from independent Claim 41; and dependent Claims 50-59 depend from independent Claim 49. These dependent claims also stand rejected under 35 U.S.C. §103(a) as being obvious in view of *Ginzboorg*. While Applicant does not acquiesce with the particular rejections to these dependent claims, including any assertions concerning inherency or the taking of Official Notice, these rejections are now moot in view of the remarks made in connection with independent Claims 1, 41, and 49. These dependent claims include all of the limitations of the base claim and any intervening claims, and recite additional features which further distinguish these claims from *Ginzboorg*. Therefore, dependent Claims 2, 4-19, 42-48, and 50-59 are also in condition for allowance

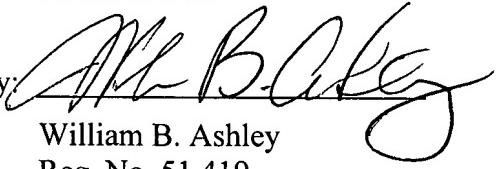
Authorization is given to charge Deposit Account No. 50-3581 (NOKI.002PA) any necessary fees for this filing. If the Examiner believes it necessary or helpful, the undersigned attorney of record invites the Examiner to contact the undersigned attorney to discuss any issues related to this case.

Respectfully submitted,

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